

### REMARKS

The Application has been carefully reviewed in light of the Office Action dated January 29, 2004 (Paper No. 22). Claims 1 to 35 are in the application, of which Claims 1, 8, 15, 22 and 29 are the independent claims. Claim 31 is being amended herein to correct a typographical error. Reconsideration and further examination are respectfully requested.

By the Office Action, Claims 1, 3, 5 to 8, 10, 12 to 15, 17, 19 to 22, 24 and 26 to 35 are rejected under 35 U.S.C. § 103(a) over U.S. Patent 5,721,572 (Wan '572) and U.S. Patent No. 5,786,908 (Liang), Claims 2, 9, 16 and 23 are rejected under 35 U.S.C. § 103(a) over Wan '572, Liang and U.S. Patent 5,553,199 (Spaulding), and Claims 4, 11, 18 and 25 are rejected under 35 U.S.C. § 103(a) over Wan '572, Liang and U.S. Patent 5,625,378 (Wan '378). Reconsideration and withdrawal of the rejections are respectfully requested.

Before discussing the applied art, the following remarks are being made based on an apparent concession made in the Office Action with respect to Wan '572, as set forth at page 3 of the Office Action. Further, it is assumed that the concession takes precedence over that portion of the Office Action which is merely a repetition of the text pasted in from the July 10, 2003 Office Action.

More particularly, with reference to pages 2 and 3 of the present Office, the paragraph beginning with "Regarding claim 1" is believed to be a repetition of the paragraph found at page 5 of the July 10, 2003 Office Action. However, the July 10, 2003 Office Action relied on Wan '572 as teaching performing a binary search and interpolating using the result as recited in the claims of the subject application. This is clearly no longer

applicable in light of the statement made at page 3 of the current Office Action, which concedes that Wan '572 fails to teach interpolating entries from the forward model look-up table at grid points that define the cell located by the binary search of the forward model look-up table. .

The remarks herein are based on the assumption that the newly-added comments regarding Wan '572 supersede the text pasted from the July 10, 2003 Office Action. Further basis for this assumption is the fact that the current Office Action changes the grounds for rejecting Claim 1, and reliance is now placed on Wan '572 in view of Liang. If Applicant's assumption is incorrect, Applicant respectfully requests the Examiner to clarify his position.

The claims rejections are traversed for the reasons that they are both technologically and legally insufficient.

Turning to the specific language of Claim 1, a method is recited for deriving a reverse model look-up table whose entries represent device dependent colors as a function of device independent colors, based on a forward model look-up table whose entries represent device independent colors obtained in response to printout of corresponding device dependent color components. The forward model and the reverse model look-up tables both comprise a grid of cells in their respective color spaces with entries at each grid point of the grid. To determine an entry in the reverse model look-up table for a device independent target color, the method comprises the steps of performing a binary search of the forward model look-up table to locate a cell that contains the device independent target color, interpolating entries from the forward model look-up table at grid points that define the cell located by the binary search of the forward model look-up table,

so as to obtain device dependent colors corresponding to the device independent target color, and storing the device dependent color at the grid point of the reverse model look-up table for the device independent target color.

The applied art, namely Wan '572 and Liang, is not seen to teach each and every feature of Claim 1, particularly with respect to performing a binary search of the forward model look-up table to locate a cell that contains the device independent target color, and interpolating entries from the forward model look-up table at grid points that define the cell located by the binary search of the forward model look-up table so as to obtain device dependent colors corresponding to the device independent target color.

As pointed out in Applicant's response to the July 10, 2003 Office Action, Wan '572 is not seen to even mention a binary search, and is certainly not seen to mention searching a forward model look-up table using a binary search to locate a device independent color. In addition, and as is discussed above, the Office Action concedes that Wan '572 fails to teach interpolating entries from the forward model look-up table at grid points that define the cell located by the binary search of the forward model look-up table.

The Office Action cites col. 14, lines 27 to 60 of Liang, as allegedly disclosing a binary search of a forward model LUT, and col. 11, lines 25 to 60 and col. 14, line 49 to col. 15, line 50, as allegedly disclosing interpolation of entries from a forward model LUT at grid points that define the cell located by a binary search.

However, the cited portions of Liang are not seen to disclose or to suggest such features. Initially, Applicant respectfully submits that the forward and inverse LUTs described in the cited portions of Liang are not even seen to involve device independent colors. More particularly, at col. 14, line 27 to 60, Liang is seen to describe generating an

inverse LUT, which maps CMYK values to RGB color values, using a forward LUT, which maps RGB values to CMYK values. In addition, Liang is seen to describe generating an inverse LUT by generating RGB values in increments of one, inspecting the forward LUT to see if the generated RGB value exists, and generating a CMYK value, if the RGB value does not exist. To generate the CMYK value, Liang is seen to describe using two existing RGB values from the forward LUT, together with a CMYK value corresponding to one of the existing RGB values and fractions derived from the two existing RGB values. Liang is not seen to describe a binary search of a forward model LUT to locate a cell that contains a device independent target color, and then interpolating using grid points of the located cell.

Therefore, for at least the foregoing reasons, the applied art, in any permissible combination, is not seen to teach or even to suggest each and every feature of Claim 1. Accordingly, Claim 1 is believed to be patentable over the applied art. In addition, Claims 8, 15, 22 and 29 are believed to be patentable over the applied art for at least the same reasons. Reconsideration and withdrawal of the rejection of these claims are therefore respectfully requested.

The remaining claims are each dependent from the independent claims discussed above and are therefore believed patentable for the same reasons. Because each dependent claim is also deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

In view of the foregoing, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

REQUEST FOR AN INTERVIEW

Applicant's undersigned attorney hereby request an interview with the Examiner in the event that, upon consideration of the remarks herein, the Examiner continues to question the patentability of the claims.

CONCLUSION

Applicant's undersigned attorney may be reached in our Costa Mesa, California office by telephone at (714) 540-8700. All correspondence should be directed to our address given below.

Respectfully submitted,

  
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